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SA2004104053

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

**ARMANDO CUEVAS, et al.,**

Plaintiffs,

**v.**

**JON DE ROCO, et al.**

Defendants.

CASE NO. CIV-S-04-2092 MCE GGH  
**STIPULATION FOR PROTECTIVE  
ORDER**

IT IS STIPULATED BY THE PARTIES AND ORDERED BY THE COURT AS  
FOLLOWS:

**A. THE ITEMS SUBJECT TO THIS PROTECTIVE ORDER CONSIST  
SOLELY OF PHOTOGRAPHS OF DEFENDANT DE ROCO**

During the course of discovery, Plaintiffs requested photographs of Defendant de Roco. Defendant de Roco is a parole agent whose duties include investigating and locating parolees at large, i.e., convicted felons on parole who have absconded. Such investigations could be impeded if his identity were widely known. The material subject to this stipulation for protective order includes only photographs of Defendant de Roco.

**B. CONDITIONS FOR RELEASE OF SUBJECT PHOTOGRAPHS**

Defendant de Roco will produce photographs of himself, subject to this protective order, on the following conditions:

1. The subject photographs may be disclosed only to the following persons:

(a) Plaintiffs and their counsel of record in this action;

(b) Paralegal, stenographic, clerical and secretarial personnel regularly employed by counsel for Plaintiffs;

(c) Court personnel and stenographic reporters engaged in such proceedings as are incidental to the preparation for the trial in this action;

(d) Any outside expert or consultant retained by Plaintiffs' counsel for purposes of this action;

(e) Witnesses to whom the subject photographs may be disclosed during or in preparation for a deposition taken in this matter or otherwise during the preparation for trial and trial, provided that the witness may not leave any deposition with copies of any of the confidential material, and shall be informed and agree to be bound by the terms of this order;

2. Plaintiffs' counsel and his legal assistants and consultants shall not make copies of the subject photographs except as necessary for purposes of this litigation.

3. The subject material in possession of Plaintiffs' counsel shall be destroyed or returned to the de Roco's counsel within 20 days of the time it is no longer needed for purposes of this litigation.

4. The subject photographs obtained by Plaintiffs' counsel shall not be disclosed except as is necessary in connection with this or related litigation, including appeals, and not for any other purpose, including any other litigation.

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1           5. The provisions of this order shall remain in full force and effect until further order  
2 of this Court.

3           IT IS SO STIPULATED.

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5 Dated: April 29, 2005

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/s/ Mark A. Miller

MARK A. MILLER  
Law Office of Miller & Simonds  
Attorney for Plaintiffs  
Cuevas and Burlette

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9 Dated: April 29, 2005

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/s/ Franklin G. Gumpert

FRANKLIN G. GUMPERT  
Barkett & Gumpert  
Attorney for Defendants  
Neves, Horn, Cook, Starr, and Golmitz

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12  
13 Dated: April 29, 2005

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/s/ David A. Carraso

DAVID A. CARRASCO  
Office of the Attorney General  
Attorney for Defendant de Roco

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16           IT IS SO ORDERED

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18 Dated: 5/4/05

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/s/ Gregory G. Hollows

U.S. Magistrate Judge

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